

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOM CA Investco LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

Re: Docket No. 737

**CERTIFICATE OF NO OBJECTION REGARDING COMBINED
FIRST MONTHLY APPLICATION OF BIENERT KATZMAN
LITTRELL WILLIAMS LLP FOR COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS SPECIAL
COUNSEL TO THE DEBTORS AND DEBTORS IN POSSESSION FOR
THE PERIOD FROM APRIL 11, 2025 THROUGH JULY 31, 2025**

The undersigned hereby certifies that they have received no answer, objection, or any other responsive pleading with respect to the *Combined First Monthly Application of Bienert Katzman Littrell Williams LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Special Counsel to the Debtors and Debtors in Possession for the Period April 11, 2025 Through July 31, 2025* [Docket No. 737] (the “Application”)² of Bienert Katzman Littrell Williams LLP (the “Applicant”). The undersigned further certifies that they have reviewed the Court’s

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], 837 Park Avenue, LLC [3229], and Terra Laguna Beach, Inc. [2344] (interim). The Debtors’ headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

docket in this case and no formal answer, objection, or other response to the Application appears thereon.³ The Application was filed with the Court on the date listed on Exhibit A.

Pursuant to the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 202] (the “Interim Compensation Order”), the Debtors are authorized and directed to pay the Applicant eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the Application upon the filing of this Certificate of No Objection without the need for entry of a Court order approving the Application.

Dated: August 27, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Sarah R. Gladieux

Christopher M. Samis (No. 4909)

Aaron H. Stulman (No. 5807)

R. Stephen McNeill (No. 5210)

Gregory J. Flasser (No. 6154)

Sarah R. Gladieux (No. 7404)

POTTER ANDERSON & CORROON LLP

1313 N. Market Street, 6th Floor

Wilmington, Delaware 19801

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Email: csamis@potteranderson.com

astulman@potteranderson.com

rmcneill@potteranderson.com

gflasser@potteranderson.com

sgladieux@potteranderson.com

Counsel to the Debtors and Debtors in Possession

³ Pursuant to the Interim Compensation Order, parties have fourteen (14) days after the date of service to object to the Application.

EXHIBIT A**MOM CA Investco LLC, *et al.*
Case No. 25-10321 (BLS)****Professional Fees and Expenses
Monthly Fee Application**

APPLICANT & DOCKET NO.	TIME PERIOD COVERED	FEES & EXPENSES REQUESTED IN APPLICATION	FEES & EXPENSES ALLOWED/ AWARDED	DATE APPLICATION FILED	OBJECTION DEADLINE
Bienert Katzman Littrell Williams LLP [Docket No. 737]	4/11/2025 - 7/31/2025	\$87,537.50 (Fees) \$989.03 (Expenses)	\$70,030.00 (Fees at 80%) \$989.03 (Expenses at 100%)	8/12/2025	8/26/2025